

EXHIBIT 3

-----X
UNIWIRED TRADING LLC,

Plaintiff,

Case No.: 07 CV 3427 (NRB)

- against -

**DECLARATION OF
KRZYSZTOF PIOTR
KOCHANOWSKI**

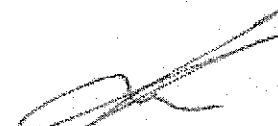
M/V WLADYSLAW ORKAN, her engines,
boilers, etc., CHINESE-POLISH JOINT
STOCK SHIPPING COMPANY and
STEMBLAR SHIPPING COMPANY,

Defendants.
-----X

Pursuant to 28 U.S.C. § 1746, KRZYSZTOF PIOTR KOCHANOWSKI declares
as follows:

1. I am a maritime attorney, resident in Poland. I am admitted to the courts
of Poland since the year 1993. Since that time, I have been exclusively engaged in the
practice of maritime and shipping law in Poland. I am the principal and leading member
of the firm Mar-Consult, located in Gdynia, Poland - www.mar-consult.com

2. Even though the Hague-Visby Rules are applicable in Poland, Polish law
does not recognize an *in rem* claim against the carrying vessel for cargo damage. Cargo
plaintiffs have no *in rem* rights whatsoever against the carrying vessel. Moreover, under
Polish law, there is no *in rem* jurisdiction over the vessel for cargo damage claims. As a
result, there has never been an instance, in the Polish courts, where a judgment has ever
been issued against a vessel *in rem*. Accordingly, the June 22, 2006 Letter of
Undertaking would be entirely moot in Poland, as no judgment or decree would ever
issue, and thus the Letter of Undertaking secures nothing.



that the foregoing is true and correct.

Executed on the 31st October, 2007
Gdynia, Poland

KRZYSZTOF KOCHANOWSKI

K. Kochanowski
radca prawny
nr wpisu Gd. - 1163

KRZYSZTOF PIOTR KOCHANOWSKI

KANCELARIA RADCY PRAWNEGO

Krzysztof Kochanowski

"Mar - Consult"

ul. T. Wendy 15, 81-963 Gdynia

tel. 058 - 661 21 42, fax 058 - 621 88 75

NIP 584-123-54-77, Regon 191792636

X:\Public Word Files\24\Kochanowski\Kochanowski Declaration. sa.doc